

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

This document relates to:

*The County of Summit, Ohio, et al. v. Purdue
Pharma L.P., et al.*
Case No. 18-op-45090

and

*The County of Cuyahoga v. Purdue Pharma
L.P., et al.*
Case No. 1:18-op-45004

**MDL No. 2804
Case No. 17-md-2804
Hon. Judge Dan A. Polster**

DEFENDANTS' AFFIRMATIVE DEPOSITION DESIGNATIONS

Pursuant to the Civil Jury Trial Order, ECF No. 1598, entered in In re National Prescription Opiate Litigation (MDL 2804) on May 1, 2019 (as amended in Judge Polster's July 29, 2019 order), as well as agreement among the parties, Defendants submit the following Affirmative Deposition Designations, Responsive Designations, and Responses to Plaintiffs' Objections:

1. Ashley, Demetra (Exhibit A)
2. Carr, Margaret (Exhibit B)
3. Garner, Chad (Exhibit C)
4. Gilson, Thomas (Exhibit D)
5. Griffin, Eric (Exhibit E)
6. Gutierrez, James (Exhibit F)
7. Harper-Avilla, Stacey (Exhibit G)

8. Howard, June (Exhibit H)
9. Johnson, Greta (Exhibit I)
10. Keenan, Maggie (Exhibit J)
11. Mapes, Michael (Exhibit K)
12. Martin, Keith (Exhibit L)
13. Nelsen, Brian (Exhibit M)
14. Prevoznik, Thomas (Exhibit N)
15. Rannazzisi, Joseph (Exhibit O)
16. Rideout, Patricia (Exhibit P)
17. Saros, John (Exhibit Q)
18. Shannon, Hugh (Exhibit R)
19. Strait, Matthew (Exhibit S)
20. Woods, Holley (Exhibit T)
21. Wright, Kyle (Exhibit U)

Defendants reserve all rights, including all rights to revise or withdraw designations. Defendants further reserve the right to revise or withdraw these designations based on the Court's rulings, Plaintiffs' and other individual Defendants' designations of deposition testimony, and evidence introduced at trial.

Defendants also reserve the right to play, in response to deposition testimony played by Plaintiffs or other individual Defendants, any testimony Plaintiffs or other Defendants have designated. By submitting these designations, Defendants do not waive any objections to the use of testimony and/or exhibits or their subject matter. Defendants' inclusion of any testimony

and/or exhibits within these designations should not be construed as an admission that such testimony and/or exhibit is admissible if offered by Plaintiffs or another Defendant.

Dated: October 10, 2019

Respectfully Submitted,

/s/ Shannon E. McClure

Shannon E. McClure
REED SMITH LLP
Three Logan Square
1717 Arch Street, Suite 3100
Philadelphia, PA 19103
Telephone: (215) 851-8100
Fax: (215) 851-1420
smcclure@reedsmith.com

Counsel for AmerisourceBergen Drug Corporation

/s/ John P. McDonald

John P. McDonald
Texas Bar No. 13549090
jpmcdonald@lockelord.com
C. Scott Jones
Texas Bar No. 24012922
sjones@lockelord.com
Lauren M. Fincher
Texas Bar No. 24069718
lfincher@lockelord.com
Brandan J. Montminy
Texas Bar No. 24088080
brandan.montminy@lockelord.com
LOCKE LORD LLP
2200 Ross Avenue
Suite 2800
Dallas, TX 75201
T: 214-740-8445
F: 214-756-8110

Attorneys for Henry Schein, Inc.

/s/ Geoffrey Hobart

Geoffrey E. Hobart
Mark Lynch
COVINGTON & BURLING LLP
One CityCenter
850 Tenth Street NW
Washington, DC 20001
Tel: (202) 662-5281
ghobart@cov.com
mlynch@cov.com

Counsel for McKesson Corporation

/s/ Kaspar J. Stoffelmayr

Kaspar J. Stoffelmayr
BARTLIT BECK LLP
54 West Hubbard Street
Chicago, IL 60654
Phone: (312) 494-4400
Fax: (312) 494-4440
kaspar.stoffelmayr@bartlitbeck.com

Counsel for Walgreen Co.

/s/ Steven A. Reed

Eric W. Sitarchuk

/s/ Enu Mainigi

Enu Mainigi

Steven A. Reed
Harvey Bartle
Rebecca J. Hillyer
MORGAN, LEWIS & BOCKIUS LLP
1701 Market St.
Philadelphia, PA 19103-2921
Tel: (215) 963-5000
Fax: (215) 963-5001
eric.sitarchuk@morganlewis.com
steven.reed@morganlewis.com
harvey.bartle@morganlewis.com
rebecca.hillyer@morganlewis.com

WILLIAMS & CONNOLLY LLP
725 Twelfth Street, N.W.
Washington, D.C. 20005
Telephone: (202) 434-5000
Facsimile: (202) 434-5029
emainigi@wc.com
Counsel for Cardinal Health, Inc

Nancy L. Patterson
MORGAN, LEWIS & BOCKIUS LLP
1000 Louisiana Street, Suite 4000
Houston, TX 77002-5005
Tel: (713) 890-5195
Fax: (713) 890-5001
nancy.patterson@morganlewis.com

Wendy West Feinstein
MORGAN, LEWIS & BOCKIUS LLP
One Oxford Centre, Thirty-Second Floor
Pittsburgh, PA 15219-6401
Tel: (412) 560-7455
Fax: (412) 560-7001
wendy.feinstein@morganlewis.com

Brian M. Ercole
MORGAN, LEWIS & BOCKIUS LLP
200 S. Biscayne Blvd., Suite 5300
Miami, FL 33131-2339
Tel: (305) 415-3000
Fax: (305) 415-3001
brian.ercole@morganlewis.com

*Counsel for Cephalon, Inc., Teva
Pharmaceuticals USA, Inc., and Actavis LLC*

CERTIFICATE OF SERVICE

I, Geoffrey E. Hobart, hereby certify that the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ Geoffrey E. Hobart
Geoffrey E. Hobart